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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

AUG - 8 2023

SEAN F. MCAVOY, CLERK
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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

14 KASSANDRA M. MONTELONGO
15 (a/k/a "Kassandra M. Montelongo
16 Alvarez"),
17 LUIS ANGEL LARA,
18 ALEXANDRO AGUILAR,
19 JOSE P. GARCIA,
20 RAFAEL MEDINA (a/k/a "Fatboy"),
21 NATHAN MENDOZA, and
22 MARIA T. MONTELONGO,

21 Defendants.

Case No. 1:23-CR-2039-MKD

SUPERSEDING INDICTMENT

Vio: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(vi), (viii), 846
Conspiracy to Distribute
Controlled Substances

21 U.S.C. § 853
Forfeiture Allegations

22 The Grand Jury charges:

23
24 Beginning on a date unknown, but by on or about August 1, 2022, and
25 continuing until on or about June 7, 2023, in the Eastern District of Washington,
26 the Defendants, KASSANDRA M. MONTELONGO (a/k/a "Kassandra M.
27 Montelongo Alvarez"), LUIS ANGEL LARA, ALEXANDRO AGUILAR, JOSE
28

SUPERSEDING INDICTMENT - 1

1 P. GARCIA, RAFAEL MEDINA (a/k/a "Fatboy"), NATHAN MENDOZA, and
2 MARIA T. MONTELONGO, knowingly and intentionally conspired with each
3 other, and with other persons known and unknown to the Grand Jury, to distribute
4 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled
5 substance, and 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-
6 piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in
7 violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi), (viii); all in violation of 21 U.S.C.
8 § 846.

12 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

14 The allegations contained in this Indictment are hereby re-alleged and
15 incorporated by reference for the purpose of alleging forfeitures.

17 Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of
18 21 U.S.C. § 841(a)(1), as charged in Counts 1 and 2 of this Indictment,
19 Defendants, KASSANDRA M. MONTELONGO (a/k/a "Kassandra M.
20 Montelongo"), LUIS ANGEL LARA, ALEXANDRO AGUILAR, JOSE P.
21 GARCIA, RAFAEL MEDINA (a/k/a "Fatboy"), NATHAN MENDOZA, and
22 MARIA T. MONTELONGO, shall forfeit to the United States of America, any
23 property constituting, or derived from, any proceeds obtained, directly or
24 indirectly, as the result of such offense(s) and any property used or intended to be
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1 used, in any manner or part, to commit or to facilitate the commission of the
2 offense(s).
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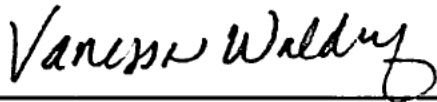
4 If any forfeitable property, as a result of any act or omission of the
5 Defendant:

- 6 (a) cannot be located upon the exercise of due diligence;
7 (b) has been transferred or sold to, or deposited with, a third party;
8 (c) has been placed beyond the jurisdiction of the court;
9 (d) has been substantially diminished in value; or
10 (e) has been commingled with other property which cannot be divided
11 without difficulty,
12

13 the United States of America shall be entitled to forfeiture of substitute property
14 pursuant to 21 U.S.C. § 853(p).
15

16 DATED this 8th day of August, 2023.
17

18 A TRUE BILL

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23 Vanessa R. Waldref
24 United States Attorney

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27 Patrick J. Cashman
28 Assistant United States Attorney